

Danner, Ward

From: Paul Parmentier <pparmentier@thesourcegroup.net>
Sent: Thursday, October 31, 2013 12:02 PM
To: Dadap, Nathan C.
Cc: neil irish; rita brenner; ragland ken
Subject: Clarification regarding disposal of PCB Waste
Attachments: two profile examples.pdf

Nathan-as we discussed, the Port still needs confirmation that the non-RCRA, Ca-haz soil or non-haz with some PCBs under 50 ppm can be sent without a TSCA waste label before they can approve the hauling/disposal companies bids. Our interpretation is that all soil <50 ppm PCBs would not be regulated under TSCA 40 CFR 761.

I have attached an example of the two profile sheets that the Port would have to fill out to classify the waste, and the Port would choose the non-TSCA category for all the soil under 50 ppm PCBs. The haulers and disposers will of course have to follow the state requirements for PCB wastes, and we will confirm that with DTSC, but in the meantime we need to have your confirmation that the profiles for soil under 50 ppm PCBs can be checked off by the Port as non-TSCA. We also assume that example profile question 9 b would be that the <50 ppm soil is not a 40CFR 761.61 (a) waste?

Can you confirm that you agree with this waste classification?

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